

# **EXHIBIT B1**

JMK:AES/GKS  
F.#2014R00501

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

15-CR-637 (S-1) (KAM)

MARTIN SHKRELI,

Defendant.

----- X

THE GOVERNMENT'S PROPOSED VOIR DIRE REQUESTS

BRIDGET M. ROHDE  
ACTING UNITED STATES ATTORNEY  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

Jacquelyn M. Kasulis  
Alixandra E. Smith  
G. Karthik Srinivasan  
Assistant U.S. Attorneys  
(Of Counsel)

STATEMENT OF THE CASE

The defendant MARTIN SHKRELI is charged in an eight-count indictment with committing various acts of securities fraud, conspiracy to commit securities fraud, and conspiracy to commit wire fraud. In Counts One through Three, defendant SHKRELI is charged with conspiracy to commit securities fraud, conspiracy to commit wire fraud and a substantive count of securities fraud in relation to an entity known as MSMB Capital. In Counts Four through Six, defendant SHKRELI is charged with conspiracy to commit securities fraud, conspiracy to commit wire fraud and a substantive count of securities fraud in relation to an entity known as MSMB Healthcare. In Counts Seven and Eight, defendant SHKRELI is charged with conspiracy to commit securities fraud and conspiracy to commit wire fraud in relation to an entity known as Retrophin.

PROPOSED VOIR DIRE REQUESTS

In accordance with Rule 24(a) of the Federal Rules of Criminal Procedure, the government respectfully requests that the Court, in addition to the Court's usual voir dire, ask the following questions in jury selection for this case:

1. As an initial matter, have you heard or read anything about this case? If yes, have you formed an opinion about the case?
2. Have you or a family member or close friend ever worked in: (a) the financial industry; or (b) law enforcement?
3. Have you, or any family member or close friend, ever worked for a lawyer or law firm, or for a court? Have you, or any family member or close friend, ever worked for a

prosecutor's office? Have you, or any family member or close friend, ever worked for a criminal defense attorney or private investigator?

4. You will hear testimony during the trial from members of law enforcement and regulators (e.g., the Federal Bureau of Investigation). Because a witness may be a government employee or member of law enforcement does not mean that his or her testimony is entitled to any greater weight by reason of his or her employment. By the same token, his or her testimony is not entitled to less consideration simply because he or she is a government employee. You should consider the testimony of members of law enforcement just as you would consider any other evidence in the case and evaluate their testimony just as you would that of any other witness. Would you have any difficulty following this rule?

5. Have you ever had any negative experiences and/or disputes with anyone involved in law enforcement or regulatory agencies?

6. Do you or a family member or close friend regularly invest in the stock market, hedge funds or privately-issued securities?

7. Do you have a financial advisor who manages your assets?

8. Do you or a family member or close friend follow any of the defendants on any social media platform?

In addition, the government respectfully requests that the Court inquire as to whether any of the prospective jurors have heard of any of the individuals, entities or

locations listed in Exhibit A to the government's April 21, 2017 filing. The government also requests permission to supplement or amend this request.

Dated: Brooklyn, New York  
April 21, 2017

Respectfully submitted,

BRIDGET M. ROHDE  
Acting United States Attorney

By: /s/ Jacquelyn M. Kasulis  
Jacquelyn M. Kasulis  
Alixandra E. Smith  
G. Karthik Srinivasan  
Assistant U.S. Attorneys  
(718) 254-7000

cc: Clerk of Court (KAM) (by ECF)  
All counsel of record (by ECF)